

# T.E.S. FILER CITY STATION

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May 18, 2015

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Via Overnight Courier**

and

**Via e-mail:** [cullen.raymond@epa.gov](mailto:cullen.raymond@epa.gov), [cantello.nicole@epa.gov](mailto:cantello.nicole@epa.gov) and  
[r5airenforcement@epa.gov](mailto:r5airenforcement@epa.gov) (Cover Letter/Narrative Response Only)

**Re: Request to Provide Information Pursuant to the Clean Air Act  
TES Filer City Station Response**

To Whom It May Concern:

TES Filer City Station, LP (“Filer”) received a Request to Provide Information Pursuant to the Clean Air Act (the “Request”) on March 18, 2015 from the U.S. Environmental Protection Agency (“EPA”). On March 27, 2015 Filer sought a 30 day extension to respond to EPA. On March 30, 2015, Nicole Cantello of EPA granted Filer’s request for a 30 day extension, making Filer’s response to the Request due on or before May 18, 2015.

Filer conducted a reasonable and diligent inquiry and review of its active paper records, plant files, project files, engineering records, procurement and delivery records and log book documentation, as well as numerous electronic databases. Filer has produced responsive documentation for the five calendar years preceding the request, to wit, 2010 through 2014. Pursuant to the instructions in Appendix A, those files that could be rendered searchable via Optical Character Recognition (“OCR”) were made so. Filer responds to those individual requests and their subparts listed in Appendix B that currently require a response, and notes the remaining portions of the Request are contingent upon EPA approvals and are not currently due, nor is a formal response necessary.

In responding to the Request, Filer has not produced documents that it considers to contain privileged communications to and from counsel or the work product of counsel or Filer employees acting at an attorney’s direction. In addition, Filer makes no claim for Confidential Business Information (“CBI”) as set forth in Appendix C of the Request for any documentation produced herein, but reserves the right to do so in additional productions if necessary.

Filer believes that this submittal provides all of the information that EPA requested and has diligently attempted to respond fully to the Request within the required 60 day period. Additional narrative responses and document productions will be submitted to EPA if further responsive materials are located. Please contact me if you have any questions or need further explanation concerning Filer's responses. Filer reserves all rights and nothing in this response or the attached documents is intended to be an admission of any liability. Finally, Filer has included an Index to the responses to this Request to aid in review of the responses. It is attached as Bates Number TESFiler0003196.

Filer's response to the Request is as follows:

### **General Objections**

Filer sets forth the following General Objections, applicable to all its responses to the Request by reference without waiving any defenses or admitting any liability, while reserving any and all applicable rights or remedies:

1. Filer objects to this Request to the extent it seeks documents or information subject to attorney client privilege or the work product doctrine.
2. Filer objects to this Request to the extent the Request is overly broad and unduly burdensome.
3. Filer objects to this Request to the extent that the Request and or any of its subparts exceed the scope of EPA's authority under the federal Clean Air Act, as amended ("CAA").
4. Filer objects to this Request to the extent it seeks information not relevant or reasonably related to either enforcement or the development of any standards as necessitated by the CAA.
5. Filer objects to this Request to the extent it uses any undefined terminology and or uses vague and or ambiguous language.
6. Filer objects to this Request to the extent that it requests items or actions that are technically impossible or infeasible.
7. Filer objects to this Request to the extent that the costs associated with the Request are expensive, burdensome and or unrelated to stated purposes under the federal CAA.

### **Filer Response to Appendix B of the Request**

1. **A copy of the Fugitive Dust Plan that describes continuous fugitive emissions control for all plant roadways, the plant yard, all material stockpiles, and all material handling operations;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0000001 through TESFiler0000006 which includes the two (2) Fugitive Dust Plans that have been in effect at Filer over the last five (5) years, as provided by Filer personnel. [Index File 1 & 2].

2. **For the 5-year period up to the date of receipt of this request, all records of the application of water or dust suppressant to the stockpiles and roadways at the Facility, including the date of the application and quantity applied;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESSFiler0000007 through TESSFiler0000047, as provided by Filer personnel. Correspondence with Mr. Ray Cullen of EPA Region 5 on March 26, 2015 helped to better characterize the granularity of the data needed to fulfill this specific portion of the Request at this time. [Index File 3].

3. **Records of visible emissions observations, both non-certified and conducted using EPA Test Method 9, of the following:**

- a. **The lime-handling baghouse and the lime bin vent filter;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESSFiler0000048 through TESSFiler0000969, as provided by Filer personnel. The responsive information can be found under the heading "LIME UNLOADING" within the provided logbook excerpts. During the 5-year period of interest, no EPA Test Method 9 opacity tests were conducted on the equipment and/or operations noted within Item 3a. [Index File 4 thru 8].

- b. **The ash/by-products unloading group consisting of all fly ash collection and transfer equipment conveyors, augers, piping, silos, and the unloading baghouse;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESSFiler0000048 through TESSFiler0000969, as provided by Filer personnel. The responsive information can be found in Bates Number TESSFiler0000048 through TESSFiler0000969 under the heading "Daily Visible Emissions Observations", with "BA" referring to bottom ash equipment and "FA" referring to fly ash equipment, as well as Bates Number TESSFiler0000970 through TESSFiler0001005, which reflect daily Visible Emission observations by the ash handler. Each notation in the latter set of material indicates that an observation of the ash system fabric filters was conducted and no visible emissions were observed. If a Visible Emission is observed the employee is instructed to contact the Maintenance Supervisor for assistance. During the 5-year period of interest, no EPA Test Method 9 opacity tests were conducted on the equipment and/or operations noted within Item 3b. [Index File 4 thru 13].

- c. **The coal stockpiles and associated handling equipment, including conveyors, augers, and hoppers;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001006 through TESFiler0001103, as provided by Filer personnel. During the 5-year period of interest, no EPA Test Method 9 opacity tests were conducted on the equipment and/or operations noted within Item 3c. [Index File 14 thru 18].

**d. The petroleum coke stockpiles and associated handling equipment, including conveyors, augers, and hoppers;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, Filer states that no such documents exist. During the 5-year period of interest, there were no dedicated petroleum coke stockpiles or associated handling equipment, as all petroleum coke was received as a homogeneous mixture with coal. The log book observations provided in relation to Item 3c pertain to the observations conducted for the petroleum coke and coal mixtures.

**e. The wood stockpiles and associated handling equipment, including conveyors, augers, and hoppers; and**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0000048 through TESFiler000969, as provided by Filer personnel. The responsive information can be found under the heading "Daily Visible Emissions Observations", with "WH" referring to the wood handling operations. During the 5-year period of interest, there were no dedicated wood stockpiles, as all wood fired in the boilers was fed via conveyor from an adjacent paper mill. Lastly, no EPA Test Method 9 opacity tests were conducted on the equipment and/or operations noted within Item 3e. [Index File 4 thru 8].

**f. The construction/demolition (C/D) material stockpiles and associated handling equipment, including conveyors, augers, and hoppers.**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, Filer states that no such documents exist. During the 5-year period of interest, no C/D materials were received by or stored at Filer, and no such materials were fired in the boilers.

**4. For the 5-year period up to the date of receipt of this request, for Boiler #1 and Boiler #2 at the Facility, each:**

**a. The maintenance and malfunction abatement management plan, including any revisions;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001104 through TESFiler0001162, as provided by Filer personnel. [Index File 19].

**b. Results of performance testing for particulate matter (PM);**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001163 through TESFiler0001272, as provided by Filer personnel. [Index File 20].

**c. Results of performance testing for non-methane hydrocarbons;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to Filer's response to Request 4b which contains the requested documentation in Bates Number TESFiler0001163 through TESFiler0001272, as provided by Filer personnel. [Index File 20].

**d. Records of opacity data from the continuous opacity monitors;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Correspondence with Mr. Ray Cullen of EPA Region 5 on March 26, 2015 helped to better characterize the granularity of the data needed to fulfill this specific portion of the Request at this time. Responsive materials include the opacity "Continuous Emission Monitor Quarterly Report Summary" documents (which identify the duration of any opacity exceedances during each calendar quarter) as well as the opacity Excess Emission Reports (which identify each discrete period of excess opacity, including the maximum opacity during each such period). [Index File 21 thru 25].

**e. Records of nitrogen oxide (NO<sub>x</sub>) emissions from the associated continuous emission monitoring system (CEMS);**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Correspondence with Mr. Ray Cullen of EPA Region 5 on March 26, 2015 helped to better characterize the granularity of the data needed to fulfill this specific portion of the Request at this time. Responsive materials include the "CEMS Daily Averages" reports (which include the 30-day rolling NO<sub>x</sub> lb/mmBtu emission rate for each boiler operating day), the NO<sub>x</sub> "Continuous Emission Monitor Quarterly Report Summary" reports (which identify the duration of any NO<sub>x</sub> exceedances during each calendar quarter) as well as the NO<sub>x</sub> "Excess Emission Reports" (which identify each discrete period of excess NO<sub>x</sub> emissions, including the maximum NO<sub>x</sub> emission rate during each such period). [Index File 21 thru 25].

**f. Records of calculated NO<sub>x</sub> emission rates in pounds per million British Thermal Units (lb/mmBTU) heat input based on a 30-day rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. The responsive material consists of the “CEMS Daily Averages” reports (which include the 30-day rolling NO<sub>x</sub> lb/mmBtu emission rate for each boiler operating day). [Index File 21 thru 25].

**g. Records of calculated NO<sub>x</sub> emission rates in tons per year (tpy), based on a 12- month rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003110 and TESFiler0003111, as provided by Filer personnel. [Index File 26].

**h. Records of sulfur dioxide (SO<sub>2</sub>) emissions from the associated CEMS;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Correspondence with Mr. Ray Cullen of EPA Region 5 on March 26, 2015 helped to better characterize the granularity of the data needed to fulfill this specific portion of the Request at this time. Responsive materials include the “CEMS Daily Averages” reports (which include the daily average and 30-day rolling SO<sub>2</sub> lb/mmBtu emission rates for each boiler operating day), the SO<sub>2</sub> “Continuous Emission Monitor Quarterly Report Summary” reports (which identify the duration of any SO<sub>2</sub> exceedances during each calendar quarter) as well as the SO<sub>2</sub> “Excess Emission Reports” (which identify each discrete period of excess SO<sub>2</sub> emissions, including the maximum SO<sub>2</sub> emission rate during each such period). [Index File 21 thru 25].

**i. Records of calculated SO<sub>2</sub> emission rates in lb/mmBTU heat input based on a 30- day rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. The responsive material consists of the “CEMS Daily Averages” reports (which include the 30-day rolling SO<sub>2</sub> lb/mmBtu emission rate for each boiler operating day). [Index File 21 thru 25].

**j. Records of calculated SO<sub>2</sub> emission rates in lb/mmBTU based on a 24-hour daily average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. The responsive material consists of the “CEMS Daily Averages” reports (which include the daily average SO<sub>2</sub> lb/mmBtu emission rate for each boiler operating day). [Index File 21 thru 25].

**k. Records of calculated SO<sub>2</sub> emission rates in tons per calendar day;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. The responsive material consists of the "CEMS Daily Averages" reports (which include the daily total SO<sub>2</sub> tons emitted for Boilers 1 and 2 combined for each calendar day; note that all such data is listed under the reports for Boiler 1). [Index File 21 thru 25].

**l. Records of calculated SO<sub>2</sub> emission rates in tpy, based on a 12-month rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003110 and TESFiler0003111, as provided by Filer personnel. [Index File 26].

**m. Records of the calculated SO<sub>2</sub> percentage reduction based on the average inlet and outlet SO<sub>2</sub> emission rates, based on a 30-day rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. The responsive material consists of the "CEMS Daily Averages" reports (which include the 30-day rolling percent SO<sub>2</sub> lb/mmBtu emission reduction for each boiler operating day). [Index File 21 thru 25].

**n. Records of carbon monoxide (CO) emissions from the associated CEMS;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Correspondence with Mr. Ray Cullen of EPA Region 5 on March 26, 2015 helped to better characterize the granularity of the data needed to fulfill this specific portion of the Request at this time. Responsive materials include the CO "Continuous Emission Monitor Quarterly Report Summary" reports (which identify the duration of any CO exceedances during each calendar quarter) as well as the CO "Excess Emission Reports" (which identify each discrete period of excess CO emissions, including the maximum CO emission rate during each such period). [Index File 21 thru 25].

**o. Records of calculated CO emission rates in lb/mmBTU heat input based on a 24- hour rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Responsive materials include the CO "Continuous Emission Monitor Quarterly Report Summary" reports

(which identify the duration of any CO exceedances during each calendar quarter) as well as the CO “Excess Emission Reports” (which identify each discrete period of excess CO emissions, including the maximum CO emission rate during each such period). [Index File 21 thru 25].

- p. Records of calculated CO emission rates in pounds per hour, based on a 24-hour rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0001273 through TESFiler0003109, as provided by Filer personnel. Responsive materials include the CO “Continuous Emission Monitor Quarterly Report Summary” reports (which identify the duration of any CO exceedances during each calendar quarter) as well as the CO “Excess Emission Reports” (which identify each discrete period of excess CO emissions, including the maximum CO emission rate during each such period). [Index File 21 thru 25].

- q. Records of calculated CO emission rates in tpy, based on a 12-month rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003110 and TESFiler0003111, as provided by Filer personnel. [Index File 26].

- r. Records of the charge rate of wood fuel in pounds per operating day (lb/day);**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003112 through TESFiler0003167, as provided by Filer personnel. [Index File 27].

- s. Records of the charge rate of tire-derived fuel in tons per hour as a daily average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003112 through TESFiler0003167, as provided by Filer personnel. [Index File 27].

- t. Records of the charge rate of C/D material in lb/day;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003112 through TESFiler0003167, as provided by Filer personnel. [Index File 27].



- u. Records of the charge rate of C/D material in tpy, based on a 12-month rolling average;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003168 through TESFiler0003169, as provided by Filer personnel. [Index File 28].

- v. Records of the charge rate of petroleum coke in lb/day; and**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003112 through TESFiler0003167, as provided by Filer personnel. [Index File 27].

- w. Records of the sulfur content of each shipment of coal.**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. Without waiving these General Objections, please refer to the documents Bates Number TESFiler0003170 through TESFiler0003191, as provided by Filer personnel. [Index File 29].

#### **PM<sub>10</sub> Monitors and Siting**

- 5. Within 30 days of receipt of this request, TES shall submit proposed monitoring site locations at the Facility for EPA review and approval prior to establishing the monitoring sites;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above. In addition, Filer objects to this specific request and those that follow to the extent it does not comply with the Paperwork Reduction Act, as amended by the Small Business Paperwork Relief Act, as Filer is aware of numerous other entities with like-kind requests from EPA. Furthermore, Filer objects to the siting of the requested PM<sub>10</sub> monitor to the extent it exceeds the EPA's authority and the scope of the Clean Air Act in determining or monitoring compliance with or uncovering a violation of a limit or standard directly applicable to Filer. Furthermore, any data collected could not be used for State Implementation Plans and or attainment determinations due to the collection point. Filer is unaware of any complaints from either an individual or the Michigan Department of Environmental Quality ("MDEQ") that would give rise to such expensive and unnecessary installation. Filer further objects to this Request as an unreasonable attempt to impose monitoring and reporting requirements on this facility that are not the least cost approach. Filer is willing to discuss with EPA more appropriate EPA methods that are far less costly than those set forth in this request. Filer objects to this Request as inappropriately imposing additional costs and monitoring

requirements outside of the operating permit process and or rulemaking process without the necessary due process protections.

Without waiving these objections, Filer states after retention of a qualified environmental consulting firm, Fishbeck, Thompson, Carr & Huber, Inc. and their thorough review of the facility and discussion with Filer personnel by a licensed professional engineer within the State of Michigan, there is no site at the facility which meets EPA criteria and guidelines for siting a PM<sub>10</sub> monitor or meteorological ("MET") tower. Please refer to Bates Number TESFiler0003192 and TESFiler0003193. In addition, see the aerial map attached in response to Item 6. If any PM monitor is to be sited on Filer property, additional discussions with EPA are necessary. [Index File 30].

- 6. Within 30 days of receipt of this request, TES shall submit to EPA a map showing the property lines of the Facility, the locations of nearby residences and industrial properties, and proposed locations of the monitoring sites;**

**Response:** Filer hereby incorporates by reference the General Objections enumerated above, as well as the response to Request #5, above. Without waiving these objections and by way of further response, Filer attaches a map showing the real property owned in fee by Filer outlined in yellow and surrounding structures as Bates Number TESFiler0003194. As clear from the map, the area surrounding Filer is primarily residential to the west and south. The area to the east/southeast of Filer is industrial and is comprised of the Packaging Corporation of America – Filer City Mill (PCA) facility. Upon information and belief, PCA is a semi-chemical mill which produces corrugated medium. This aerial photograph depicts numerous excluded areas in regards to the potential siting of PM monitors based on a subset of the siting criteria contained in *40 CFR Part 58, Appendix E—Probe and Monitoring Path Siting Criteria for Ambient Air Quality Monitoring*. For the purpose of the siting analysis, Filer has employed the siting criteria for microscale systems assuming that the PM monitoring is meant to characterize fugitive PM emissions from the coal and petroleum coke storage area north/northwest of the facility. For the northern Filer parcel, the area within the green cross hatching represents an existing wooded area, while the area within the blue cross hatching reflects a distance of 10 meters from the edge of the tree line consistent with Section 5(a) of the EPA guidance. For the southern Filer parcels, there are two rectangular areas and a circular area. These areas reflect a distance out from the edges of the structures which are equal to two times the structure height minus an assumed PM monitor height of 2 meters. The green circle is centered on the ash storage silo, which has a height of 110 feet; the radius of the circle is thus 206.9 feet (i.e.,  $2 \times [110' - 6.56']$ ). The red square is centered on the 125 foot tall boiler house, with a distance between the edges of the red square and the boiler house equal to 236.9 feet (i.e.,  $2 \times [125' - 6.56']$ ). Lastly, the blue rectangle is centered on the 50 foot tall cooling tower with a distance between the edges of the blue rectangle and the cooling tower equal to 86.9 feet (i.e.,  $2 \times [50' - 6.56']$ ). With the exception of two small areas in the southwest and southeast corners of the southern Filer parcels, all other areas on the Filer property fail to meet even a subset of the siting criteria regarding spacing from trees and or obstructions. The two aforementioned areas also fail to meet other siting criteria, with the locations being in close proximity to roadways such that the locations would be heavily impacted by local vehicular traffic. If the intent of the PM monitor is to characterize fugitive

dust from coal and or petroleum coke storage and handling as opposed to vehicular traffic, then the EPA guidance at 6.3(b) and Figure E-1 would suggest that the PM monitors should be located approximately 20 meters or more from roadways. If any PM monitor is to be sited on Filer property, additional discussions with EPA are necessary. [Index File 31].

7. **Within 30 days of EPA approval of the monitoring site locations specified in paragraph 5, TES shall install, operate, and maintain at least one ambient monitoring site at the Facility that shall contain at least one continuous Federal Equivalent Method (FEM) real-time PM<sub>10</sub> monitor and at least one Federal Reference Method (FRM) PM<sub>10</sub> filter- based monitor operating every third day;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

8. **The monitoring sites and monitoring equipment shall conform with the following requirements:**
  - a. **The PM<sub>10</sub> real-time and filter-based instruments shall meet the specifications of FRM/FEM monitors on this list:**  
[www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf](http://www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf);
  - b. **TES shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58, Appendix E;**
  - c. **PM<sub>10</sub> concentrations from filter-based sampling shall be determined according to 40 CFR 50, Appendix J to Part 50 -"Reference Method for the Determination of Particulate Matter as PM<sub>10</sub> in the Atmosphere;"**
  - d. **All data collected shall be consistent with units in the National Ambient Air Quality Standards for PM<sub>10</sub>; and**
  - e. **A data logger shall be attached to the monitors to record readings from the continuous monitors.**

**Response:** Filer responds to Request #8 and all of its subsections by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

9. **TES shall also follow the operating procedures identified in the "Quality Assurance Handbook for Air Pollution Measurement Systems" (located at <http://www.epa.gov/ttn/amtic/qabook.html>), 40 CFR Part 58, Appendix A, and any specified procedures in the manufacturer's maintenance manual for the units used to monitor PM<sub>10</sub>;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

10. **TES shall be responsible for all operation and maintenance associated with the PM<sub>10</sub> monitors. Maintenance shall include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

11. **TES shall order and pay for any necessary replacement parts, accessories, maintenance, etc.;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

12. **TES shall properly change the PM<sub>10</sub> filters in all sampling devices;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

13. **TES shall archive all filters from the PM<sub>10</sub> filter-based instruments for at least two years;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

14. **TES may apply to EPA to cease compliance with this Request, however, at least one year of information must be collected under this Request before such an application is made;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and further notes that a response is not required at this time.

#### **Wind Speed and Direction Monitoring**

15. **TES shall install a meteorological tower at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the**



entire ambient monitoring period. TES shall correlate 1-hr and 24-hr ambient PM<sub>10</sub> measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM<sub>10</sub> concentrations. The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) PM<sub>10</sub> concentrations as recorded by the monitors. TES shall maintain and/or submit reports and records in accordance with the paragraphs 16-24, below;

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5. Without waiving any objections and in further response, Filer notes that siting any meteorological tower at Filer using EPA guidelines may, in fact, be impossible due to the size of the site and restrictive EPA guidelines. Please see Bates Number TESFiler0003195. This document consists of an aerial photograph depicting the facility and surrounding area, with the three parcels of land owned by Filer outlined in yellow. The aerial includes a red circle reflecting those areas not acceptable for the siting of a MET tower pursuant to the criteria listed in Table 1-2 and Figure 2.5 of the EPA's *Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final)*. Specifically, the EPA guidance suggests that the MET tower should not be located within 10 times the height of potential obstructions. Filer's main boiler house is 125 feet in height, and the red circle reflects a circle centered on the boiler house and having a radius of 1,250 feet (i.e., 10 times the height of the boiler house). If any meteorological tower is to be sited on Filer property, additional discussions with EPA are necessary. [Index File 32].

16. With respect to the meteorological monitoring site, TES shall follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at: [http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV Meteorological Measurements.pdf](http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV%20Meteorological%20Measurements.pdf);

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5 and #15 and further notes that a response is not required at this time.

17. The internal clocks of all PM<sub>10</sub> analyzers, data loggers, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference clock at least once every 30 days. Instrument clocks that are more or less than 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log;

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time.

18. **Continuous PM<sub>10</sub> data collected during wind speeds of less than 0.5 meters per second shall be segregated from other wind data for purposes of wind speed and wind direction correlations;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time.

19. **TES shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. TES shall order and pay for any necessary replacement parts, accessories, maintenance, etc.;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time.

#### **General Requirements Applicable to All Requests**

20. **Within 30 days of EPA approval of the monitoring sites, TES shall submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at <http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>. Any measures identified by this information request should be incorporated into the QAPP;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time.

21. **TES shall provide EPA and/or the Michigan Department of Environmental Quality access to the monitoring sites and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, TES shall take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance shall be approved by EPA prior to the change;**

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15 and #16. Filer further notes that Michigan Air Rule 213(1)(d) provides for MDEQ site access and further notes that an additional response is not required at this time.

22. **TES shall keep a daily log and monthly reports of the following information:**
- a. **Each site visit and operator activities;**



- b. Any monitoring system downtime (date, time, duration, and reason) along with any connective actions taken;
- c. Any possible interferences observed by the operator such as nearby construction or demolition; and
- d. Any calibration data provided by the manufacturer or performed by TES.

**Response:** Filer responds to Request #22 and all of its subsections of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time to these very vague and ambiguous requests.

23. Hourly data from each monitor and meteorological monitoring site, and 24-hour data from gravimetric monitors shall be downloaded as ASCII comma-delimited files and provided to EPA on CD and by email every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row. All filter analysis data, including any specification data shall also be provided;

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes that a response is not required at this time.

24. Monthly reports specified in paragraph 23 above shall be submitted to EPA for a period of one year. Each report is due within 14 days of the end of the month being reported. At the end of the one year time frame, TES may seek termination or modification of this request. TES shall submit all documents due under this request and the monthly reports to [cullen.raymond@epa.gov](mailto:cullen.raymond@epa.gov), [cantello.nicole@epa.gov](mailto:cantello.nicole@epa.gov), [r5enforcement@epa.gov](mailto:r5enforcement@epa.gov), and:

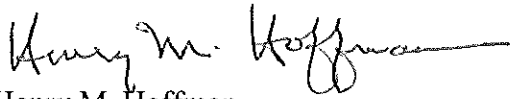
Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Response:** Filer responds to this specific portion of the Request by incorporating by reference the General Objections listed above, as well as those in the Response to Request #5, #15, #16 and further notes this cover letter/narrative response to the Request is being submitted in the manner proscribed. Responsive documentation to this Request is far too large to be attached to an e-mail and is being sent via overnight mail in electronic format. In addition, there is an error in the e-mail address [r5enforcement@epa.gov](mailto:r5enforcement@epa.gov), as e-mails sent to this address are returned as undeliverable.

### Certification

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

Truly yours,

A handwritten signature in cursive script, reading "Henry M. Hoffman".

Henry M. Hoffman  
Plant Manager

cc. Joe Tondu, (electronically, w/o attachments)  
Tom Allen, (electronically, w/o attachments)  
Scott Sinkwitts, Esq, (electronically)  
Rick Brown, (electronically)  
Jason Prentice, (electronically)